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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORP., JANE
DOE-1, JANE DOE-2, EDWIN
MALDONADO, SCOTT MALONEY,
JUSTYNA MALONEY, PATRICK
COLLIGAN, and WILLIAM SULLIVAN,

Plaintiffs,

v.

MYHERITAGE LTD., et al.,

Defendant.

Civil Action No. 24-cv-4392 (HB)

**JOINT MOTION TO STAY ALL
DEADLINES**

Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, and William Sullivan (“Plaintiffs”) and Defendant MyHeritage Ltd. (“Defendant”), by and through their undersigned counsel and subject to the approval of this Court, move to stay all deadlines.

The parties have reached a settlement in principle and are in the process of memorializing the terms of a written settlement agreement. The parties anticipate that they will be able to finalize their settlement within sixty (60) days. Accordingly, the parties respectfully request that the Court grant a stay of the deadline to respond to the Complaint from March 18, 2025 (Dkt. No. 63) proceedings between the parties until May 19, 2025.

The parties agree that should settlement not be achieved by May 19, 2025, nothing shall bar Defendant from filing a responsive pleading in this matter, including, but not limited to the pre-trial motions addressed in the Court’s Order of January 22, 2025. (*Id.*)

Good cause exists for granting this Joint Motion, as set forth above.

Plaintiffs and Defendant, therefore, request that the Court grant their Joint Motion to Stay All Deadlines and stay Defendant’s time to respond to the Complaint in this matter until May 19, 2025.

Respectfully submitted this 17 day of March, 2025.

/s/ Ryan Joseph McGee

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document has served on March 17, 2025 to all counsel of record who is deemed to have consented to electronic service via the Court's CM/ECF system.

By: /s/ Nicholas K. Lagemann